

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

| | | |
|--|---|--------------------|
| ----- | X | |
| RAMON VALENCIA, on behalf of himself and all | : | |
| others similarly situated, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| -against- | : | 21 Civ. 00448 (PK) |
| | : | |
| LIVE LION SECURITY LLC, BENJAMIN MEHREL, | : | |
| and JOSEPH JACOBOWITZ, | : | |
| | : | |
| Defendants. | : | |
| ----- | X | |

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Affirmation of Louis Pechman, Esq., with its attached exhibits, as well as all prior proceedings had in this Action, Plaintiff Ramon Valencia and opt-in Plaintiff Norelvi Serrano will move this Court before the Honorable Peggy Kuo, United States Magistrate Judge for the Eastern District of New York, for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure and the Fair Labor Standards Act granting final approval of the Parties' settlement on a class and collective action basis. For the Court's convenience, a proposed Order is attached to the Affirmation of Louis Pechman, Esq. as Exhibit D.

Dated: New York, New York
August 5, 2022

PECHMAN LAW GROUP PLLC

By: /s/ Louis Pechman

Louis Pechman, Esq.
Gianfranco J. Cuadra, Esq.
488 Madison Avenue, 17th Floor
New York, New York 10022
Tel.: (212) 583-9500
pechman@pechmanlaw.com
cuadra@pechmanlaw.com

*Attorneys for Plaintiffs, the Rule 23 Class, and
the FLSA Collective*

To: Chaim Book, Esq.
Christopher Neff, Esq.
Moskowitz & Book, LLP
345 Seventh Avenue, 21st Floor
New York, New York 10001
Tel.: (212) 221-7999
cneff@mb-llp.com
cbook@mb-llp.com
Attorneys for Defendants